

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

MARIE BRYAN,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. ST-14-CV-97
)	
GOVERNMENT OF THE VIRGIN ISLANDS,)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	

JOINT PROPOSED DISCOVERY PLAN

COME NOW, Richard P. Rouco, Esquire and Robert M. Weaver, Esquire, Attorneys for Plaintiff Marie Bryan, and Ariel M. Smith, Attorney for Defendant Government of the Virgin Islands. The parties hereby give notice that a Rule 26(f) conference was held on March 2 2015 and that they agree to carry out discovery and case management in accordance with the schedule set forth below.

A. POSSIBILITIES FOR PROMPT SETTLEMENT OR RESOLUTION

- (1) **Plaintiff's Statement:** Plaintiff does not anticipate being able to settle or resolve this case prior to the completion of written discovery.
- (2) **Defendants' Statement:** Defendants concur with Plaintiff and do not foresee a resolution of this matter prior to the completion of written discovery.

B. DISCOVERY PLAN

- (1) Discovery should be conducted in phases and should not be limited to certain issues.
- (2) The parties shall exchange the disclosures required by Rule 26(a) by **April 2, 2015.**
- (3) The presumptive limits set forth in Rule 30(a)(2)(A) for depositions shall apply.
- (4) The presumptive limits set forth in Rule 33(a) for interrogatories shall apply.

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(5) Initial written discovery shall be propounded and completed on or before **September 2, 2015**; responses will be completed as required by Fed. R. Civ. P. 33 and Fed. R. Civ. P. 34; supplemental written discovery will be propounded no later than 21 days following receipt of the opposing parties' responses.

(6) Fact witness depositions shall be completed on or before **February 1, 2016**;

(7) Plaintiff does not require a physical or mental examination of Defendants.

(8) Expert disclosures for Plaintiffs, including expert reports, to be completed by **March 1, 2016**;

(9) Expert disclosures for Defendant, including expert reports, to be completed by **April 15, 2016**;

(10) Fact discovery is ongoing and the parties will work together throughout the discovery periods to meet their obligations under the Federal Rules and the Rules of this Court. All discovery is to be completed by **April 15, 2016**;

(11) Mediation shall be commenced by no later than **April 30, 2016**.

C. MOTIONS

(1) Dispositive motions will be filed on or before July 1, 2016.

Respectfully Submitted:

Quinn, Connor, Weaver, Davies & Rouco, LLP

March 16, 2015

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March 16, 2015

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